

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997

) Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE DESIGNATION OF WRITTEN CROSS-EXAMINATION (December 10, 1997)

Pursuant to the direction of the Presiding Officer's Ruling No. R97-1/77 and statement at Tr. 17/7976, the Office of the Consumer Advocate hereby designates the following answers to discovery requests received too late to be included as designated written cross-examination and written answers to questions posed during oral cross-examination. Also, OCA designates for inclusion into the record certain redirected interrogatory responses of witness Patelunas as explained below.

1. Nieto (T2) Interrogatories UPS/USPS-T2-10 previously designated but not in transcript (See Tr. 7/3241,3370-1), written responses to questions during oral cross-examination at Tr. 7/3507, 3531;
2. Moden (T4) Interrogatories UPS/USPS-T4-10;
3. Alexandrovich (T5) Interrogatories MPA/USPS-T5-4, follow-up DFC/USPS-T5-11-16, follow-up ABP/USPS-T5-1, 2, POIR No. 3, Question 15 and 17, POIR No. 4 Question 8a, POIR No. 6 Question 4, written response to OCA question during oral cross-examination at Tr. 13/7176;
4. Tolley (T6) Written response to Presiding Officer question during oral cross-examination at Tr. 13/6939;
5. Musgrave (T8) POIR No. 5 Question 1;

6. Tayman (T9) Follow-up interrogatories DMA/USPS-T9-35-38, POIR No. 5 Questions 15 and 16;
7. Degen (T12) Interrogatories Follow-up TW/USPS-T12-41-43, TW/USPS-5 redirected from Postal Service, POIR No 5 Question 20, written responses to questions during oral cross-examination at Tr. 12/6637, 6642 lines 4-6 and lines 8-11, 6643, 6644, 6660;
8. Patelunas (T15) Revised ABP/USPS-T15-3, OCA/USPS-T24-74.b. redirected from witness Lion, first and second revised NDMS/USPS-T15-1, revised response UPS/USPS-T33-58 redirected from witness Sharkey, revised response NDMS/USPS-T33-24 incorrectly labeled OCA/USPS-T33-24, POIR No. 5 Question 14.

Several redirected responses of witness Patelunas were inadvertently omitted from the previous OCA designations and were not designated by any other participant. OCA designates for inclusion in the record the following additional redirected responses of witness Patelunas:

- a. OCA Interrogatories T24-25, 60(b), 74(b) revised, all redirected from witness Lion, T5-3-6, 9, 28-29 redirected from witness Alexandrovich, T9-21(a),(b) redirected from witness Tayman, OCA/USPS 4-6 redirected from Postal Service; and
 - b. DFC Interrogatories T24-1-2 redirected from witness Lion, USPS-6 redirected from Postal Service.
9. Hatfield (T16) POIR No. 4 Questions 7, 9, 10;
 10. Hume (T18) Interrogatories NNA/USPS-T18-1;
 11. Nelson (T19) Interrogatories OCA/USPS-T5-15 redirected from witness Alexandrovich;
 12. Treworgy (T22) Interrogatories OCA/USPS-T22-12; and 20.b., e., and g.; responses to oral questions of OCA posed at hearing (Tr. 3/1295, and 1296-98); and response to POIR #5, question 17;
 13. Lion (T24) Interrogatories OCA/USPS-T24 96-101 (including revisions to responses 96 and 98); and response to an oral question of OCA posed at hearing (Tr. 3/1192-93);
 14. Hatfield (T25) POIR #4, questions 7, 9, and 10;
 15. Schenk (T26) Interrogatories OCA/USPS-T27-1-6; POIR #3, question 27;

16. Crum (T28) POIR #4, question 8.c.;
17. Daniel (T29) Interrogatory OCA/USPS-T12-43 redirected from witness Degen; revised answer to AMMA/USPS-1;
18. O'Hara (T30) Interrogatories ABA&EEI&NAPM/USPS-T30-2-4, and 6;
19. Fronk (T32) Interrogatories ABA/USPS-T25-2-5 redirected from witness Hatfield; POIR #5, question 18; response to an oral question of OCA posed at hearing (Tr. 4/1686-87);
20. Sharkey (T33) Interrogatories DBP/USPS-8.i., q.-t., v., w.; 11.a. and b.; 12.a. and b.; 39.a.-j., and r.; 53, and 56 redirected from the Postal Service;
21. Taufique (T34) POIR #4, question 6; and POIR #6, question 2;
22. Moeller (T36) response to oral question of RIAA posed at hearing (Tr. 6/3094-96);
23. Mayes (T37) Interrogatories OCA/USPS-T37-1 (partial); DBP/USPS-39.l. and 82 redirected from the Postal Service; POIR #4, question 8.b.; POIR #5, question 13; and POIR #6, question 3;
24. Adra (T38) POIR #5, question 12;
25. Needham (T39) Interrogatories OCA/USPS-T24-88, 89, and 92.b.-d., and f. redirected from witness Lion; DBP/USPS-16.a.-d., 21.m.-p., r., v., y.-aa., and cc., 37 (including supplementary response to 37.l.), 54, 62, 80, 84, and 101 redirected from the Postal Service; POIR #5, questions 2-7; and response to an oral question of DBP posed at hearing (Tr. 3/697-99);
26. Plunkett (T40) Interrogatories OCA/USPS-T40-31.a. (revised) and 40 (revised); DBP/USPS-24, 25.a., c.-g., k.-u., 26. c. and d. (revised), 27, 28.a.-v., 29, 30.c.-j., 31, 32, 33.a.-s., 34, 36, 38. c. and d., 50.c.-e., 51, 53.a.-e., h., j.-n., p.-s., u.-w., bb.-ff., 62.h.-k., 64, 73-78, 83, 85-87, and 90; POIR #5, questions 8-11; POIR #6, questions 5 and 6; response to an oral question of OCA posed at hearing (Tr. 3/1047); and response to oral question of DBP posed at hearing (Tr. 3/971);
27. Takis (T-41) Response to an oral question posed at hearing (Tr. 9/4790);
28. Currie (T-42) Interrogatory DBP/USPS-57 redirected from USPS;
29. Institutional responses of the Postal Service to interrogatories: AMMA/USPS-2; and DBP/USPS-8.e.-bb., and 9.b.-aa.;

- 30. Request for Admissions DFC/USPS-RA-1-3;
- 31. Response to POIR #7.

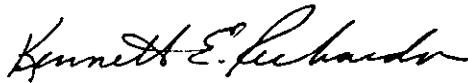
Respectfully submitted,



KENNETH E. RICHARDSON
Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



KENNETH E. RICHARDSON
Attorney

Washington, D.C. 20268-0001
December 10, 1997